

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: STRUDEL HOLDINGS LLC and AVR AH LLC, Debtors.¹	§ § § § § § § § §	Chapter 11 Case No. 23-90757 (CML) (Jointly Administered)
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**SECOND SUPPLEMENTAL DECLARATION OF JOSHUA W. WOLFSHOHL IN
SUPPORT OF MOTION TO AMEND ORDER AUTHORIZING THE RETENTION
AND EMPLOYMENT OF PORTER HEDGES LLP AS COUNSEL
FOR THE DEBTORS AND DEBTORS IN POSSESSION**

I, Joshua W. Wolfshohl, declare as follows:

1. I am a partner in the law firm of Porter Hedges LLP (“PH”). I am admitted in, practicing in, and a member in good standing of the state bar of Texas.
2. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, information supplied to me by other PH professionals or paraprofessionals, or learned from my review of relevant documents. To the extent any information disclosed herein requires amendment or modification as additional party in interest information becomes available to PH, a supplemental declaration will be submitted to this Court reflecting such amended or modified information.
3. I submit this Second Supplemental Declaration in support of the *Debtors’ Emergency Motion to Amend Order Authorizing the Retention and Employment of Porter Hedges LLP as Counsel for the Debtors and Debtors in Possession* (the “Motion to Amend”), as required

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: AVR AH LLC (0148) and Strudel Holdings LLC (5426). The Debtors’ service address is: PO Box 4068, Aspen, CO 81612.

by Bankruptcy Code Sections 327(a) and 329, Bankruptcy Rules 2014(a) and 2016(b), Bankruptcy Local Rules 2014-1(a) and 2016-1, and the U.S. Trustee Guidelines.

ADDITIONAL TRANSFERS FROM CHARIF SOUKI

4. On January 17, 2024, Souki filed his Statement in Connection with Funding of Professional Fees (Doc. No. 353) (the “Souki Statement”). The Souki Statement disclosed that Souki would directly pay PH’s professional fees and that he would waive any claims against the Debtors in connection with such direct payments to PH.

5. On January 18, 2024, prior to any objection being filed, Souki wired PH the sum of \$175,000.00. PH is holding these funds in trust and will not apply them absent approval of the Motion to Amend.

6. On January 26, 2024, Souki wired PH an additional sum of \$140,000.00. PH is holding these funds, totaling \$315,000.00, in trust and will not apply them absent approval of the Motion to Amend.

Pursuant to 28 U.S.C. § 1746, to the best of my knowledge, information and belief, and after reasonable inquiry, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 29, 2023
Houston, Texas

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl